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March 2, 2020

Honorable Lois Bloom  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

RE: Britney Rudler v. MLA Law Offices, Ltd. and John L. Malevitis  
19-cv-02170 (LDH)(LB)

Dear Magistrate Judge Bloom:

I write to correct certain representations which I made in good faith in prior filings. Initially, in the Defendant's opposition to the Plaintiff's motion to strike the Defendant's Rule 68 offer of judgment which I filed this morning, I asserted that the Plaintiff's attorney, J. Remy Green, refused to produce the Plaintiff for a deposition until April. Attorney Green reminded me during a telephone conversation this afternoon that an email was sent to me agreeing therein to produce the Plaintiff for a deposition in late March. Also, in a prior filing addressed to District Judge Hall, I asserted that I was advised by an attorney who was named as a defendant in the *Rudler v. Houslanger, PLLC* action (referenced in the opposition I filed today) that attorney Green had surreptitiously recorded telephone conversations with that defendant attorney. Attorney Green assured me today that no such recording(s) occurred.

Finally, attorney Green and I engaged in extensive settlement negotiations this afternoon during our telephone conversation in a mutual effort to end litigation of the above-entitled action.

Respectfully submitted,

/ s / *Robert L. Arleo*

Robert L. Arleo

RLA:gra  
Cc: Defendants  
All attorneys of record via ECF